

**DISCOVERY PLAN WORKSHEET**  
 (for Fair Debt Collection Practices Act ("FDCPA") Cases)

Deadline for completion of Rule 26(a) initial disclosures: <i>(Presumptively 30 days after filing date)</i>	April 11, 2019
First request for production of documents and for interrogatories due by: <i>(Presumptively 60 days after filing date)</i>	June 4, 2019
Motion to join new parties or amend the pleadings: <i>(Presumptively 90 days after filing date)</i>	n/a
COMPLETION OF ALL DISCOVERY, including all expert disclosures under Rule 26(a)(2), if any, to be completed by: <i>(Presumptively 120 days after filing date)</i>	September 4, 2019
Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?	No, but subject to change